

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2023 MAR -8 PM 3:33

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YOHANCE HATARI NEAL
LU'CRETIA M. JOHNSON,

Defendants.

CASE NO. *D:23CD-99*

JUDGE *Ser US*

INFORMATION

18 U.S.C. § 1343

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(18 U.S.C. § 1343: Wire Fraud)

At all times relevant to this Bill of Information:

1. From on or about January 28, 2008 to on or about October 20, 2017, the Defendant, **YOHANCE HATARI NEAL**, was employed as a recruiter for Company A. Company A is located in New Albany, Ohio, in the Southern District of Ohio, and specializes in the national delivery and installation of large items for national retailers and manufacturers in various businesses, including home furnishings, appliances, mattresses/bedding, and exercise equipment.
2. During his employment with Company A, Defendant **YOHANCE HATARI NEAL**'s job duties included, but were not limited to, recruiting experienced independent contract motor carriers for home delivery and installation services for large items that had been purchased through several national retailers.
3. As a recruiter for Company A, Defendant **YOHANCE HATARI NEAL** had

discretion to determine where advertisements were placed and which approved vendors' services were utilized in support of his recruiting efforts. Those services included placing ads in newspapers and on websites such as Craigslist, and Indeed, among others.

4. From on or about August 14, 2009 to on or about August 14, 2017, Defendant **LU'CRETIA M. JOHNSON** was the owner of a Houston, Texas company operating as A-1 Advertising Company ("A-1"), located at 3230 S. Gessner Road, Apt. 507, Houston, Texas. A-1 also used the address P.O. Box 940487, Houston, Texas 77094. A-1 was not a registered business with the Texas Secretary of State.

5. On or about October 8, 2009, A-1's vendor application was approved by Company A. A-1 received its first payment from Company A on or about January 11, 2010.

6. On or about October 10, 2017, after an internal and private investigation, Company A terminated Defendant **YOHANCE HATARI NEAL**'s employment due, in part, to questions regarding the Defendant's recruiting efforts and A-1's submission of invoices to Company A, invoices that Company A subsequently paid to A-1 for ads placed or other services provided. In fact, no ads had been placed or services rendered to Company A.

The Scheme to Defraud

7. From on or about at least May 22, 2014, through on or about at least February 28, 2017, the Defendants, **YOHANCE HATARI NEAL** and **LU'CRETIA M. JOHNSON**, devised and intended to devise a scheme to defraud, in order to deprive another, specifically Company A, of money or property by means of a material misrepresentation or concealment of a material fact, to wit: the Defendants, **YOHANCE HATARI NEAL** and **LU'CRETIA M. JOHNSON** devised a scheme whereby Defendant **LU'CRETIA M. JOHNSON** would submit

fraudulent invoices to Company A for advertising wherein the services were never provided, thus causing Company A to pay the fraudulent invoices.

8. It was part of the scheme to defraud that Defendant **YOHANCE HATARI NEAL**, in performing his duties at Company A, facilitated the payment of invoices from Company A to A-1 for advertising services, even though he knew that no advertisements for Company A had been placed in newspapers or on social media.

9. It was part of the scheme to defraud that Defendant **LU'CRETIA M. JOHNSON** opened an A-1 bank account (x5081) at Wells Fargo Bank. Defendant **LU'CRETIA M. JOHNSON** was the sole signatory on the account. A-1's Wells Fargo account (x5081) was the account where all payments from Company A were deposited.

10. It was further part of the scheme to defraud that the Defendant **LU'CRETIA M. JOHNSON**, during the period March 13, 2015 to December 29, 2016, purchased six cashier's checks, totaling \$20,783.00, from the A-1 bank account at Wells Fargo with Defendant **YOHANCE HATARI NEAL**, dba Choice Delivery and Logistic Professionals, as the listed payee, with an address of P.O. Box 940487, Houston, Texas 77094. Choice Delivery and Logistic Professionals was not a registered business with the Texas Secretary of State.

11. It was further part of the scheme to defraud that Defendant **YOHANCE HATARI NEAL**, during his employment with Company A, facilitated the submission of approximately 86 invoices from A-1 Advertising, totaling approximately \$124,332.30, for advertising services that were purportedly rendered to Company A, when in fact, the majority of invoices submitted were fraudulent, in that the services were never provided to Company A, thereby enriching Defendants **YOHANCE HATARI NEAL** and **LU'CRETIA M. JOHNSON** at the expense of Company A, in the approximate amount of \$120,628.39.

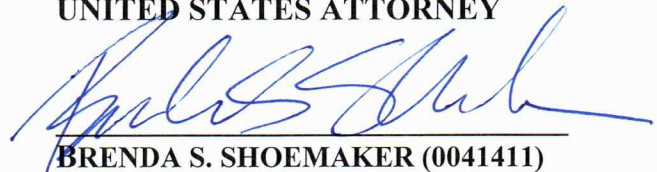
The Wire Communication

12. On or about the date set forth below, in the Southern District of Ohio and elsewhere, the Defendants, **YOHANCE HATARI NEAL** and **LU'CRETIA M. JOHNSON**, for the purpose of executing and attempting to execute the scheme described above, transmitted and caused to be transmitted, by means of wire communication in interstate and foreign commerce, the signals and sounds described below:

COUNT	DATE	WIRE COMMUNICATION
1	2/28/2017	Wire transfer from Company A to A-1 Advertising Company in the amount of \$3,918.64.

In violation of 18 U.S.C. §§ 1343 and 2.

KENNETH L. PARKER
UNITED STATES ATTORNEY



BRENDA S. SHOEMAKER (0041411)
Assistant United States Attorney